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August 12, 2024

Via ECF

The Honorable Margaret M. Garnett, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Gutierrez v. Alba Carting & Demolition, et al.*
Case No.: 1:23-cv-07138 (MMG)(SDA)

Dear Judge Garnett:

We are counsel to Plaintiff in the above referenced matter. We write jointly with counsel to Defendants to respectfully request that the Court stay all discovery and interim deadlines while the parties pursue a class-wide mediation.

Currently, Phase 1 Discovery is set to conclude on September 6, 2024, and the parties are to file a joint status letter by September 20, 2024 (Dkt. No. 56).

The parties have scheduled the mediation for September 27, 2024, with Martin F. Scheinman. The parties request leave to report back to the Court two weeks after the mediation is complete. This is the parties' first request to stay deadlines in order to pursue private class mediation and is requested by all parties.

We thank Your Honor for considering our request.

Respectfully submitted,

/s/ C.K. Lee
C.K. Lee, Esq.

cc: all parties via ECF